

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
_____ DIVISION

Jack Roberts, Individually and as
Power-of-Attorney for Barbara Roberts,
and Frank Roberts, Individually,

Plaintiffs,

v.

County of Aiken, Aiken County Sheriff's
Office, Aiken County Emergency Medical
Services, Michael E. Hunt, Individually and in
his Official Capacity as Aiken County Sheriff,
Clay Killian, individually and in his Official
Capacity as Aiken County Administrator,
Jeannie Turner, Individually and in her Official
Capacity as 911 Dispatcher for Aiken County;
and John Does,

Defendants.

Civil Action No.: _____

(Civil Action No. 2021-CP-02-00948)
(Court of Common Pleas)

**ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES ON BEHALF
OF DEFENDANTS AIKEN COUNTY,
ACSO, AIKEN COUNTY EMERGENCY
MEDICAL SERVICES, HUNT,
KILLIAN, AND TURNER**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, as amended, the following answers to Interrogatories are hereby submitted on behalf of the Defendants County of Aiken, Aiken County Sheriff's Office ("ACSO"), Aiken County Emergency Medical Services, Michael E. Hunt, Clay Killian, and Jeannie Turner:

1. State the full name, address and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

None.

2. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE:

These Defendants are requesting a jury trial.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE:

Not applicable.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE:

It would appear that the appropriate division is the Aiken Division.

Upon information and belief, the alleged incident that is the subject of this lawsuit occurred in Aiken County, South Carolina and most of the parties reside or are located in or near Aiken, South Carolina.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

These Defendants are unaware of any related action filed in the District of South Carolina.

6. If the Defendants are improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

Not applicable upon information and belief.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE:

Not applicable.

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Columbia, South Carolina
June 10, 2021